



Patrick W. Turner
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Legal Department

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February 11, 2009

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's
Intervention in Numbering Resources Determinations
Docket No.

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Charleston Rate Center and a Proposed Order Reversing Numbering Determination in the above-captioned matter.

By copy of this letter, I am serving a copy of these documents on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml
Attachment
728748

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA’S)
PETITION REQUESTING THE COMMISSION’S)
INTERVENTION IN NUMBERING RESOURCES)
DETERMINATIONS)
_____)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE CHARLESTON RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T South Carolina”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging numbering determinations, petitions the Public Service Commission of South Carolina (“Commission”) for review of a recent denial of AT&T South Carolina’s application for use of numbering resources in the 843 area code. Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”), depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “Central office code administration,”¹ and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of

¹ See, e.g., 47 C.F.R. §52.15.

NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer, the United States Navy.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides certain services that are regulated by the Commission. Among other things, it provides intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Mt. Pleasant exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”).³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“*Third NRO Order*”).

³ See 47 C.F.R. § 52.13 (a), (b).

⁴ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 (“Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.”).

center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about December 19, 2008, AT&T South Carolina submitted a Pooling Administration System request for numbering resources. In order to meet the customer's express request for numbers,⁹ AT&T South Carolina requested the assignment of 843-794-0000 through 843-794-9999 in the Charleston Rate Center.¹⁰ This new exchange number will equal the

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) ("*First NRO Order*").

⁶ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁷ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

¹⁰ See Exhibit B to this Petition.

Defense Switching Network (DSN) prefix.¹¹ As AT&T South Carolina does not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that the numbers be assigned to it.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Charleston Rate Center had a MTE of 90.874 months for the relevant block, and a utilization of 66.096%.¹²

10. Thereafter, also on December 19, 2008, AT&T South Carolina's request was denied because AT&T South Carolina had not met the rate center based MTE criterion now set forth in the INC Guidelines.¹³ AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Charleston Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving

¹¹ See Exhibit A.

¹² See Exhibit B.

¹³ See *Id.*

telecommunications services of their choice from providers of their choice for want of numbering resources.”¹⁴

12. Both the FCC’s rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁵

13. Prior to the FCC’s Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider’s inventory did not have a block of sequential numbers large enough to meet the customer’s specific request. Under today’s procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.”¹⁶ In addition, the FCC has ruled that, “States...may grant requests for customers seeking contiguous block of numbers.”¹⁷

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with

¹⁴ *Second NRO Order* at ¶ 61.

¹⁵ *See Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) (“The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission”); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) (“Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body”).

¹⁶ *Third NRO Order* at ¶ 64.

¹⁷ *Id.*


AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to assign 843-794-0000 through 843-794-9999 to AT&T South Carolina so it can fulfill the numbering request of its customer, the United States Navy; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 11th day of February 2009.



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

EXHIBIT A



DEPARTMENT OF THE NAVY
NAVAL COMPUTER AND TELECOMMUNICATIONS STATION
JACKSONVILLE, FLORIDA 32212-0111

2070
Ser N2/357
3 NOV 2008

AT&T Business Systems
Attn: Nancy Maddox
Federal Group
410 N Cedar Bluff Rd
Knoxville, TN 37923

Subj: NEW TELEPHONE EXCHANGE NUMBER FOR NAVAL WEAPONS STATION
CHARLESTON

Dear Ms. Maddox:

In preparation for the summer 2009 opening of the new Naval Medical Clinic at Naval Weapons Station, we are requesting a new telephone exchange number (NXX) be set up. We would like (843) 794-0000 through 794-9999 assigned for Naval Weapons Station, Charleston. This will satisfy the requirement for additional telephone numbers. The new Exchange number will equal the Defense Switching Network (DSN) prefix.

The existing NXXs (574, 764, and 863) will be relinquished after a transition period of approximately one year.

Point of Contact for this matter will be Marie Roberson, Telecommunications Specialist, Base Communication Office (BCO) Charleston, South Carolina, Commercial (843) 764-7702, DSN 792-7702.

A handwritten signature in black ink, appearing to read "C. E. Bennett".

C. E. BENNETT
By direction

EXHIBIT B

Pooling Administration System

 rena.wilkie@att.com (SP)

• Sign Out

Time : 12/19/2008 08:24:47 AM EST

Printable Version

- + ☐ Individual Block Requests
- + ☐ CO/NXX Code Requests
- + ☐ Confirm Resources In Service
- + ☐ Donate Blocks
- + ☐ Submit Forecast
- + ☐ Search Forms
- + ☐ Reports
- + ☐ User Profile

Central Office Code (NXX) Assignment Request
Part 1 December 9, 2005

Tracking
Number: **843-CHARLESTON-SC-262965**

Full NXX:
**Dedicated
Customer**

Type of
Application: New Change ¹ Delete

1.0 GENERAL INFORMATION**1.1 Contact Information:**

Code Applicant:

Company/Entity
Name: **BELLSOUTH SO BELL**

Headquarters
Address: **675 West Peachtree St ne**

City, State, Zip: **atlanta ,GA ,30375**

Contact Name: **rena butticaz**

Contact
Address: **675 West Peachtree St NE**

City,State,Zip: **Atlanta, GA, 30375**

Phone: **770-945-9630** FAX: **770-945-9630** E-
mail: **rw0052@att.com**

Code Administrator: ²

Name: **Michael Ortega**

Address: **46000 Center Oak Plaza**

City,State,Zip: **Sterling ,VA ,20166**

Phone: **571-434-5348** FAX: **571-434-5502**

1.2 NPA: **843** NXX: ³ LATA: **436** OCN: ⁴ **9417**
Parent Company's OCN(s) **9400**

Switching Identification(Switch Entity/POI) ⁵ **chtnscdp82e**

Locality/City/Wire Center: **charleston**

Rate Center: ⁶
CHARLESTON

Homing Tandem Operating Co: ⁷ **at&t** Tandem Homing CLLI
⁸ **:chtnscdt60t**

1.3 Dates: Date of
Application: **12/19/2008**

Request Effective Date: ^{9 10}
02/23/2009

By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? Yes No **X**

1.4 a) Type of company/entity requesting the code: **Incumbent Local Exchange Carrier (ILEC)** (LEC, IC, CMRS, Other)
b) Types of service: **Wireline** (e.g., Cellular - Type 2)
c) Code Assignment Preference (Optional) **customer request 843 794**
d) Codes that are undesirable, if any **all except above code 843 794**
e) Type of change(Mark **all** that apply)
OCN-Intra-company ¹¹ Switching Id Rate Center Tandem
Homing CLLI
OCN-Inter-company ¹² Effective Date LATA Extend
Reservation

1.5 Type of Request (Initial, growth, etc.) **Growth**

If an initial code, attach(1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pooling Indicator: ¹³ Yes No

1.6 NPA Jeopardy Criteria Apply: Yes No

1.7 Code request for new service (Explain): **request for dedicated code to meet customer needs**

1.8 Part 2 is attached Part 2 is not attached **X** for BIRRDS ^{14 15}
Additional Documentation is attached Additional Documentation is not attached
X

Comments:

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with Central Office Code (NXX) Assignment Guidelines posted to the ATIS Web Site (<http://www.atis.org/atis/clc/inc/incdocs.htm>) as of the date of this application: ¹⁶

rena butticaz

Signature of Code Applicant

**Associate
Technical
Support
Analyst** 12/19/2008
Title Date

¹ Identify type and reason for change(s) in Section 1.4(e).

² A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

³ The NXX field is required for any code request in which there is a change or the NXX is being returned.

⁴ Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (973-884-8355) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the TelcordiaTM Routing Administration (TRA) on 732-699-6700.

⁵ This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character TelcordiaTM COMMON LANGUAGE CLLITM Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

⁶ Rate Center name must be a tariffed Rate Center associated with toll billing.

⁷ Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

⁸ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLITM Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

⁹ Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

¹⁰ Requests for code assignment should not be made more than six months prior to the requested effective date.

¹¹ Select if you are the current Code Holder

¹² Select if you are not the current Code Holder

¹³ The Applicant will indicate "YES" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

¹⁴ Applicant is not required to submit Part 2 of the code request form if it is doing its own TelcordiaTM Business Integrate Routing and Rating Database System (BIRRDS) entries, or if the applicant has arranged for a third party to input the Part 2 forms data on its behalf.

¹⁵ WARNING! It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDS. The 45 calendar day nationwide minimum interval cut-over for BIRRDS will not begin until input into BIRRDS has been completed.

¹⁶ An incomplete form may result in delays in processing this request.

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Pooling Administration System









 rena.wilkie@att.com (SP)

• Sign Out

Time : 12/19/2008 08:25:09 AM EST

Printable version

May 16, 2008

- +  Individual Block Requests
- +  CO/NXX Code Requests
- +  Confirm Resources In Service
- +  Donate Blocks
- +  Submit Forecast
- +  Search Forms
- +  Reports
- +  User Profile

Appendix 3

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹

(Thousands-Block Number Pooling Growth Block Request)

Tracking Number: **843-CHARLESTON-SC-262965**Date: **12/19/2008**OCN: **9417**Company Name: **BELLSOUTH SO BELL**Rate Center: **CHARLESTON**

List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):

Name of Block Applicant: **rena butticaz**Signature: **rena butticaz**Title: **Associate Technical Support Analyst**
FAX No.: **770-945-9630**Telephone No.: **770-945-9630**E-mail: **rw0052@att.com**A. Available Numbers: **123059**B. Assigned Numbers: **325576**C. Total Numbering Resources: **492582**D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²: **0**List
Excluded
Code(s) or
Block(s):

Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
-473	-896	-2571	-356	938	1110						

E. Growth
History -
Previous 6
months³F. Forecast
- Next 12
months⁴

-473	-896	-2571	-356	938	1110						
------	------	-------	------	-----	------	--	--	--	--	--	--

-375	-375	10000	-375	-375	-375	-375	-375	-375	-375	-375	-375
------	------	-------	------	------	------	------	------	------	------	------	------

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **1354.167**H. Months
to

Numbers Available for Assignment to

Exhaust⁵
=

Customers(A)

Average Monthly Forecast(G)

Block Requested
1

Available Numbers
123059

Months To Exhaust
90.874

I.
Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= 66.096

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation:

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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Pooling Administration System

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Time : 12/19/2008 08:23:33 AM EST

Navigation: Version

- + ☐ Individual Block Requests
- + ☐ CO/NXX Code Requests
- + ☐ Confirm Resources In Service
- + ☐ Donate Blocks
- + ☐ Submit Forecast
- + ☐ Search Forms
- + ☐ Reports
- + ☐ User Profile

November 21, 2003
ATIS-0300066.at3

Attachment 3

Pooling Administrator's Response/Confirmation
TBPAG Part 3

Tracking Number : 843-CHARLESTON-SC-262965

Date of Application: 12/19/2008 Effective Date: _____
Date of Receipt: 12/19/2008 Date of Response: 12/19/2008

Service Provider Name: BELLSOUTH SO BELL
(Telcordia TM LERG TM Routing Guide) OCN: 9417

NPAC SOA SPID : _____

Pooling Administrator Contact Information:

Dora Wirth Phone: 925-363-8706
Signature of Pooling Administrator
Dora Wirth Fax: 925-363-7684
Name (print)
Email: dora.wirth@neustar.com

NPA-NXX or NPA-NXX-X : _____ Block Assigned: _____
Block Reserved : _____
Block Reservation Expiration Date : _____
Block/Code Modified : _____
Block/Code Disconnected : _____

Block Contaminated(Yes or No) : _____
If Yes, enter the number of TNs contaminated : _____

Switch Identification(Switch Entity/POI): ¹ chtnscdp82e
Rate Center: CHARLESTON
Rate Center Sub Zone: _____

☒ Form Complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands'Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request withdrawn.

Explanation

Assignment activity suspended by the administrator.

Explanation

Remarks

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLITM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia LERG ROUTING Guide and CLI are trademarks of Telcordia Technologies, Inc.)









Back

Pooling Administration System

 rena.wilkie@att.com (SP)[• Sign Out](#)

Time : 01/21/2009 04:13:05 PM EST



- +  Individual Block Requests
- +  JCO/NXX Code Requests
- +  Confirm Resources In Service
- +  Donate Blocks
- +  Submit Forecast
- +  Search Forms
- +  Reports
- +  User Profile

Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹

Your Utilization calculates to **66.096%**. The FCC required the utilization of **75.000%**.
You have requested more blocks than you will exhaust in six months.

Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Need to request a State Waiver
- ☐ Received a State Waiver

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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) **CERTIFICATE OF SERVICE**

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused AT&T South Carolina’s Petition for Review of Numbering Resources Determination in the Charleston Rate Center to be served by the method indicated below upon the following this February 11, 2009:

Thomas C. Foley
Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(Electronic Mail)

Ms. Kimberly Miller
Regulatory Policy Attorney
NeuStar-NANPA
2000 M Street, NW, Suite 600
Washington, DC 20036-3328
(Electronic Mail)

Wayne Milby
Sr. NPA Relief Planner
NueStar-NANPA
8385 Yahley Mill Rd.
Richmond, VA 23231
(Electronic Mail)

Mr. John Manning
Director
NANPA Regional Offices
46000 Center Oak Plaza
Sterling, VA 20166
(Electronic Mail)

Ms. Amy Putnam
Director-Neustar National Pooling Administrator
1800 Sutter Street
Suite 780
Concord, CA 94520
(Electronic Mail)

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Nyla M. Laney